

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
(Indianapolis Division)

RED BARN MOTORS, INC.,
PLATINUM MOTORS, INC., and
MATTINGLY AUTO SALES, INC.,
individually, and on behalf of other
members of the general public
similarly situated,

v.

NEXTGEAR CAPITAL, INC.,
F/K/A DEALER SERVICES
CORPORATION,

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DOCKET NO. 1:14-cv-01589-TWP-DLP

CLASS ACTION

**DECLARATION OF JOHN BURLACU, SENIOR DIRECTOR OF
DONLIN, RECANO & COMPANY, INC.**

I, John Burlacu declare:

1. I am a Senior Director employed by Donlin, Recano & Company, Inc. (“Donlin Recano”) located at 6201 15th Avenue, Brooklyn, New York 11219. The following statements herein are of my personal knowledge.

2. Donlin Recano was engaged by the Plaintiffs to supervise and administer the Class Settlement Notice and other procedures set forth in the Settlement Agreement between Plaintiffs and Defendant NextGear Capital, Inc. (“NextGear”) (Filing No. 373-9).

3. I provide this Declaration to update the status of Donlin Recano’s administration of the Settlement.

Updated Status of Forms W-9

4. As of the date of this filing, Donlin Recano has received 17 Forms W-9 out of 431 that were sent out to Class Members along with their Class Settlement Notice.

Updated Status of Class Objectors

5. As of the date of this filing, Donlin Recano has received no letters of objection to the settlement from any class members.

Updated Costs Incurred

6. On June 15, 2021, Donlin Recano received \$50,000 from NextGear as a pre-payment of its reasonable and necessary Class Settlement Notice and Administrative Costs.

7. Donlin Recano has invoiced a total of \$105,041.21 to date on the administration of the Class Settlement Notice in this matter for fees and expenses, and will continue to incur additional fees and expenses as Class Member questions and responses are received and addressed and payments are distributed.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed this September 23rd, 2021 in Brooklyn, New York.

State of New York
County of Kings

Sworn before me this
September 23rd, 2021.

By

John Burlacu
John Burlacu

Inna Dudik

Notary Public

Inna Dudik
Printed Name of Notary Public

My Commission expires: 03/29/2024

DUDIK INNA
Notary Public State of New York
No. 01DU6107415
Qualified in Kings County
Commission Expires 03/29/2024